Exhibit B

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Marc Zwillinger

From:

Ira P. Rothken <ira@techfirm.net> Sunday, February 19, 2012 1:52 PM

Sent:

Bob.Wiechering@usdoj.gov; Marc Zwillinger

To: Cc:

tcgreen@sidley.com; ira@techfirm.com; emcnicholas@sidley.com

Subject:

Mega Data Time Sensitive

Bob,

Thank you for you recent Mega data clarification to Tom.

I am copying Carpathia's counsel, Marc Zwillinger, on this email thread. Carpathia has voiced concern about whether or not the US has approved Mega data access to the Mega legal team and if so under what conditions.

We understand from you that the US is not asserting any control over the Mega data located at Carpathia.

We understand from Carpathia that they are not exercising any ownership or control over the data located at Carpathia - indeed they have acknowledged that such data is owned by Megaupload.

Tom Green and I would like to have a reputable e-discovery vendor mirror in a read only (non destructive) manner with integrity about three of the three hundred or so servers located at Carpathia so we can better meet and confer with the United States (and to some extent with Carpathia and others) on a variety of issues from proposals regarding data preservation and e-discovery to unfreezing assets to logistics, feasability, and possible heuristics for consumer data access to costs of doing all of the above.

As the above Mega data mirrors are for our Mega legal team and will not implicate any public usage we do not need to discuss any copyright related issues at this point - indeed such data will help us to meet and confer with you over such issues. It is also likely that the servers our legal team mirrors will not be content storage servers.

Please advise if the US has any objection or is otherwise agreeable to the above e-discovery read only mirroring. We would like to perform this in the next few days so we can view the results and take you up on your invitation of providing more specificity related to our next meet and confer letter to you.

This type of ediscovery sampling (that should take a few hours to perform) to help resolve threshold issues is highly supported by key policy makers, organizations (like Sedona Conference of which the undersigned is a member), and federal courts who have looked at such issues.

Please advise of any questions.

Thanks,

Ira P. Rothken Rothken Law Firm Techfirm.com 415 924 4250 Ira@techfirm.com